

# *Exhibit A*

*Michael J. House v. General Electric Co., et al.*  
*USDC Eastern District of Michigan Case No.: 2:19-cv-10586*  
Defendant General Electric Co.'s Rule 12(b)(1), (%), and (6) Motion to Dismiss 6/20/2019

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MICHAEL J. HOUSE,

Plaintiff,

v.

GENERAL ELECTRIC CO., ET AL.,

Defendants.

**CASE NO. 2:19-cv-10586**

**JUDGE GERSHWIN A. DRAIN**

**MAGISTRATE JUDGE STEPHANIE  
DAWKINS DAVIS**

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**DECLARATION OF MAHENDRA NAIR IN SUPPORT OF DEFENDANT  
GENERAL ELECTRIC COMPANY'S RULE 12(B)(3)  
MOTION TO DISMISS FOR IMPROPER VENUE**

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I, Mahendra Nair, depose and state as follows:

1. I am over 21 years of age and fully competent and authorized to make this Declaration.

2. I am General Manager of GE Aviation's GEnx Programs. I have personal knowledge of the facts set forth in this Declaration.

3. General Electric Company is a New York corporation, with a principal place of business in Boston, Massachusetts.

4. General Electric Aviation ("GE Aviation") is an operating unit of General Electric Company, headquartered in Evendale, Ohio. GE Aviation is a

provider of aircraft engines and parts for commercial, military, business, and general aviation aircraft.

5. I have reviewed the complaint in this matter and I understand that the plaintiff alleges that the GEnx and GE9X aircraft engines supplied by GE Aviation infringe U.S. Patent No. 7,140,873 B1.

6. I understand that the U.S. District Court for the Eastern District of Michigan has jurisdiction over cases filed in Michigan's eastern Lower Peninsula, comprising the following counties: Alcona, Alpena, Arenac, Bay, Cheboygan, Clare, Crawford, Genesee, Gladwin, Gratiot, Huron, Iosco, Isabella, Jackson, Lapeer, Lenawee, Livingston, Macomb, Midland, Monroe, Montmorency, Oakland, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon, Saginaw, St. Clair, Sanilac, Shiawassee, Tuscola, Washtenaw, and Wayne.

7. GE Aviation does not make, sell, offer to sell, or service GEnx and GE9X engines in the Eastern District of Michigan.

8. GE Aviation has no manufacturing facilities in the Eastern District of Michigan.

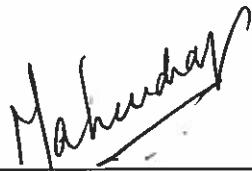
9. GE Aviation has no maintenance and repair facilities in the Eastern District of Michigan.

10. GE Aviation has no sales operations or sales representatives located in the Eastern District of Michigan.

11. GE Aviation has not sold, offered to sell, or delivered GEnx or GE9X engines to any customer based in the Eastern District of Michigan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 19, 2019



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Mahendra Nair  
General Manager GEnx